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AISHAH BUENAVENTURA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,
Plaintiff,
vs.
AISHAH BUENAVENTURA,
Defendant.

) Case Nos. 17-CR-395-EMC-2
) 17-CR-401-EMC
) 17-CR-402-EMC
)
)
) STIPULATION TO EXCLUDE TIME AND
) [PROPOSED] ORDER TO CONTINUE
) STATUS CONFERENCE
)
)
)
)
)

This matter is currently set for a status conference on January 24, 2018, at 2:30 p.m. The parties hereby stipulate to vacate that date and reset the status conference for Wednesday, February 28, 2018, at 2:30 p.m. Defense counsel is requesting that the status conference be continued to February 28, 2018, at 2:30 p.m. in order for defense counsel to complete the review of all of the discovery provided in this case, discuss it with Ms. BUENAVENTURA, and adequately prepare the defense. A continuance of this status conference will allow defense counsel the reasonable time necessary for effective preparation.

The defendant and the government consent to the extension of time, and the parties represent that good cause exists for this extension, including the effective preparation of counsel. The parties agree that the time between January 24, 2018 and February 28, 2018 should be excluded under the Speedy Trial Act pursuant to 18 U.S.C. §3161(h)(7)(A) and (h)(7)(B). The parties also agree that the ends of justice are served by granting an extension of time and that an exclusion of time outweighs the best interests of the public and the defendant in a speedy trial.

See 18 U.S.C. §3161(h)(7)(A).

SO STIPULATED.

Dated: January 18, 2018

/s/
COLIN L. COOPER
Attorney for AISHAH BUENAVENTURA

Dated: January 18, 2018

/s/
JULIE D. GARCIA
Assistant United States Attorney

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,) Case Nos. 17-CR-00395-EMC-2
Plaintiff,) 17-CR-00401-EMC
vs.) 17-CR-00402-EMC
AISHAH BUENAVENTURA,)
Defendant.)
) [PROPOSED] ORDER

~~[PROPOSED] ORDER~~

For the reasons stated above, the Court continues the above entitled matters to Wednesday, February 28, 2018, at the hour of 2:30 p.m. The court also finds that the exclusion of this period from the time limits applicable under 18 U.S.C. §3161 is warranted, and that the ends of justice served by the continuance outweigh the interests of the public and the defendant in a speedy trial for the periods from January 24, 2018 and February 28, 2018, *See* 18 U.S.C. §3161(h)(7)(A); and that the failure to grant the requested exclusion of time would deny counsel for the defendant the reasonable time necessary for effective preparation and continuity of counsel, taking into account the exercise of due diligence, and would result in a miscarriage of justice. *See* 18 U.S.C. §3161(h)(7)(B)(iv).

IT IS SO ORDERED.

DATED: 1/19/18

